

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
THOMAS A. MCKAY  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

ranello@maglaw.com  
(212) 880-9520

SENIOR COUNSEL

PAUL R. GRAND

—

COUNSEL

JASMINE JUTEAU

—

ROBERT G. MORVILLO

1938-2011

MICHAEL C. SILBERBERG

1940-2002

JOHN J. TIGUE, JR.

1939-2009

\* ALSO ADMITTED IN WASHINGTON, D.C.

\*\* ALSO ADMITTED IN CONNECTICUT

July 14, 2023

**VIA ECF**

The Honorable Michael A. Hammer  
United States District Court  
Martin Luther King Jr. Federal Building & U.S. Courthouse  
50 Walnut Street, Room 2C  
Newark, NJ 07102

Re: *United States v. Silviu Catalin Balaci*, Case No. 19-cr-877-CCC

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of defendant Silviu Balaci. Mr. Balaci's current bail conditions, imposed on July 21, 2020, following his guilty plea on July 9, 2020, require, among other things, that he reside and remain in Germany. Mr. Balaci has fully complied with his bail conditions to date. We respectfully request, with no objection from the government or Pretrial Services, to modify Mr. Balaci's bail conditions to allow him to travel to Romania from August 6, 2023, through August 27, 2023, on an itinerary to be provided in advance to Pretrial Services. The purposes of the travel are for Mr. Balaci to renew his Romanian passport, to conduct business meetings, and to have his young children spend time with his parents (their grandparents).

As noted, neither the government nor Pretrial Services objects to this request. Thank you for the Court's attention to this matter.

Respectfully submitted,  
/s/ Robert J. Anello  
Robert J. Anello

cc: Assistant United States Attorney Anthony Torntore (via ECF and email)  
U.S. Pretrial Services Officer Vincent Imbrosciano (via email)